## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

Jonathan Kastenbaum, Administrator of the Estate of MAKRUFATUL YETI SRIANINGSIH, deceased,

No. 1:23-cv-00051

Plaintiff.

v.

THE BOEING COMPANY,

Defendant.

## DEFENDANT THE BOEING COMPANY'S MOTION TO STAY DEADLINES AND PROCEEDINGS

Defendant The Boeing Company ("Boeing") respectfully moves this Court to stay deadlines and proceedings in this action until the Judicial Panel on Multidistrict Litigation (the "Panel") has ruled on Boeing's pending Motion for Transfer of Actions ("MDL Motion") under the multidistrict litigation statute, 28 U.S.C. § 1407. This lawsuit is one of 21 related actions pending in this Court and the U.S. District Court for the Northern District of Illinois. As more fully explained in Boeing's Memorandum in Support, a stay will ensure that all pretrial proceedings can be coordinated efficiently and consistently by a single court as contemplated by 28 U.S.C. § 1407. In the unlikely event the Panel denies Boeing's MDL Motion, any delay in this Court will be minimal and cause no prejudice to the Plaintiff.

WHEREFORE, for the reasons stated above, as well in Boeing's Memorandum in Support, Boeing respectfully requests that this Court stay this action in its entirety pending a ruling on Boeing's Motion for Transfer of Actions before the Judicial Panel on Multidistrict Litigation.

Dated: February 1, 2023 Respectfully submitted,

By: /s/ John K. Roche

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## **CERTIFICATE OF SERVICE**

I, John K. Roche, certify that on February 1, 2023, I electronically filed the foregoing *MOTION TO STAY* with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorneys of record.

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